

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

*Caption in Compliance with D.N.J. LBR 9004-2(c)*

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*In re:*

ORBIT ENERGY & POWER, LLC,  
  
Debtor.

Chapter 11

Case No. 22-19628

**APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

TO: The Honorable Andrew B. Altenburg, Jr.

On or about December 6, 2022, Orbit Energy & Power, LLC (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, as amended. Pursuant to Local Bankruptcy Rule 9013-5, Ciardi Ciardi & Astin, proposed counsel to the Debtor, hereby requests the following relief be provided on a first day:

1. Motion for Entry of an Interim Order (1) Authorizing Use of Cash Collateral, (2) Payment of Pre-Petition Wages and other benefits; and (3) Use of Pre-Existing Bank Accounts on a Limited Basis.
2. Motion to Extend Time to File Schedules and Statement of Financial Affairs
3. Motion to Approve Insurance Premium Finance Agreement

4. Motion For Interim And Final Authority To Honor And Then Assume Certain Third Party Consumer Financing Programs Pursuant To 11 U.S.C. §365(A) And Federal Rule Of Bankruptcy Procedure 6003

5. Motion for Authority to Assume Certain Fuel and Home Depot Credit Cards

6. Motion for Authority to Pay Certain Pre-Petition Claims of Critical Vendors

Wherefore, the Debtor respectfully requests the entry of an Order pursuant tot D.N.J. LBR 9013-5 scheduling an expedited hearing on the foregoing First Day Motions.

Dated: December 6, 2022

CIARDI CIARDI & ASTIN

By: /s/ Albert A. Ciardi, III  
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